STATEMENT OF BASIS

as required by LAC 33:IX.3109, for draft Louisiana Pollutant Discharge Elimination System Permit No. LA0102440; AI 41088; PER20080001 to discharge to waters of the State of Louisiana as per LAC 33:IX.2311.

The permitting authority for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality

Office of Environmental Services

P. O. Box 4313

Baton Rouge, Louisiana 70821-4313

I. THE APPLICANT IS:

Town of Columbia

Columbia Municipal Wastewater Treatment Plant

P.O. Box 10

Columbia, LA 71418

II. PREPARED BY:

Rachel Owens

DATE PREPARED:

May 29, 2008

III. PERMIT ACTION:

reissue LPDES permit <u>LA0102440</u>, AI <u>41088</u>; <u>PER20080001</u>

LPDES application received: March 26, 2008

EPA has not retained enforcement authority.

LPDES permit issued: October 1, 2003

LPDES permit expires: September 30, 2008

IV. FACILITY INFORMATION:

- A. The application is for the discharge of treated sanitary wastewater from a publicly owned treatment works serving the Town of Columbia.
- B. The permit application does not indicate the receipt of industrial wastewater.
- C. The facility is located on East Pearl Street Extension in Columbia, Caldwell Parish.
- D. The treatment facility consists of an extended aeration activated sludge process including a bar screen,a wet weather storage pond, 2 lift stations, aeration followed by secondary clarification, rapid sand filtration, chlorination and outfall piping.

E. Outfall 001

Discharge Location:

Latitude 32° 6' 14" North

Longitude 92° 4' 5" West

Description:

treated sanitary wastewater

Designed Flow:

0.09 MGD

Calculations for gallons per day were based upon figures obtained from Chapter 15 of the State of Louisiana Sanitary Code, Department of Health and Hospitals, Office of Public Health.

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V. RECEIVING WATERS:

The discharge is into an effluent pipe, thence into the Ouachita River in segment 080601 of the Ouachita River Basin. This segment is not listed on the 303(d) list of impaired waterbodies.

The designated uses and degree of support for Segment 080601 of the Ouachita River Basin are as indicated in the table below $^{1/2}$:

Overall Degree of Support for Segment 080601	Degree of Support of Each Use						
	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
Full	Full	Full	Full	N/A_	N/A	N/A	N/A

 $^{^{1/2}}$ The designated uses and degree of support for Segment 080601 of the Ouachita River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2006 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 080601 of the Ouachita River Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U. S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 27, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

VII. HISTORIC SITES:

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

VIII. PUBLIC NOTICE:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

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Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Ms. Rachet Owens
Water Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX. PROPOSED PERMIT LIMITS:

Final Effluent Limits:

Subsegment 080201, Ouachita River- Columbia Lock and Dam to Jonesville, is not listed on LDEQ's Final 2006 303(d) List as impaired. However, subsegment 080201 was previously listed as impaired for organic enrichment/low DO, nutrients and phosphorus, for which the below TMDL has been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards

Ouachita River TMDL for Dissolved Oxygen and Nutrients

To address organic enrichment/low DO and nutrients, the Ouachita River TMDL for Dissolved Oxygen and Nutrients was finalized on May 28, 2002. The TMDL states that there are only two point source discharges in this subsegment both belonging to the Town of Columbia. As per this TMDL, "no charges needed to be made to the point source permit limits.

OUTFALL 001

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
BOD₅	N/A	10 mg/l	15 mg/l	Limits are set in accordance with the Statewide Sanitary Effluent Limitations Policy (SSELP) for facilities of this treatment type and size and is in accordance with Ouachita River TMDL for Dissolved Oxygen and Nutrients.

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Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
TSS	N/A	15 mg/l	23 mg/l	Since there is no numeric water quality criterion for TSS, and in accordance with the current Water Quality Management Plan, the TSS effluent limitations shall be based on a case-by-case evaluation of the treatment technology being utilized at a facility. Therefore, a Technology Based Limit has been established through Best Professional Judgement for the type of treatment technology utilized at this facility.

^{*}Concentration limits are used in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which express BOD₅ and TSS in terms of concentration.

Other Effluent Limitations:

1) Fecal Coliform

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.b.i, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) pH

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C., the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

3) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

X. PREVIOUS PERMITS:

LPDES Permit No. LA0102440: Issued: October 1, 2003

Expires: September 30, 2008

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Effluent Characteristic	Discharge !	Limitations	Monitoring Requ	Monitoring Requirements	
	Daily Avg.	Daily Max.	Measurement	Sample	
		•	<u>Frequency</u>	<u>Type</u>	
Flow	Report	Report	Continuous	Recorder	
BOD₅	10 mg/l	15 mg/l	1/month	Grab	
TSS	15 mg/l	23 mg/l	1/month	Grab	
Fecal Coliform Colonies	200	400	1/month	Grab	

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) Inspections

A review of the files indicates that no inspections have been performed at the facility in the past two years.

B) Compliance and/or Administrative Orders

A review of the files indicates that no compliance orders have been issued to the facility in the past two years.

C) DMR Review

A review of the discharge monitoring reports for the period beginning **January 2006** through **December 2007** has revealed that no violations have been reported.

XII. ADDITIONAL INFORMATION:

The Louisiana Department of Environmental Quality (LDEQ) reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional water quality studies and/or TMDLs. The LDEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDLs for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

In accordance with LAC 33:IX.2903., this permit may be modified, or alternatively, revoked and reissued, to comply with any applicable effluent standard or limitations issued or approved under sections 301(b) (2) Cc) and CD); 304(b) (2); and 307(a) (2) of the Clean Water Act, if the effluent standard or limitations so issued or approved:

- Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
- 2. Controls any pollutant not limited in the permit; or
- 3. Require reassessment due to change in 303(d) status of waterbody; or
- Incorporates the results of any total maximum daily load allocation, which may be approved for the receiving water body.

At present, the Monitoring Requirements, Sample Types, and Frequency of Sampling as shown in the permit are standard for facilities of flows between 0.02 and 0.10 MGD.

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Effluent Characteristics	Monitoring Requirements		
	Measurement	Sample	
	Frequency	Type	
Flow	1/week	Measure	
BOD ₅	1/month	Grab	
Total Suspended Solids	1/month	Grab	
Fecal Coliform Bacteria	1/month	Grab	
pH	1/month	Grab	

Pollution Prevention Requirements

The permittee shall institute or continue programs directed towards pollution prevention. The permittee shall institute or continue programs to improve the operating efficiency and extend the useful life of the facility. The permittee will complete an annual Environmental Audit Report <u>each year</u> for the life of this permit according to the schedule below. The permittee will accomplish this requirement by completing an Environmental Audit Form which has been attached to the permit. All other requirements of the Municipal Wastewater Pollution Prevention Program are contained in Part II of the permit.

The audit evaluation period is as follows:

Audit Period Begins	Audit Period Ends	Audit Report Completion Date
Effective Date of Permit	12 Months from Audit Period Beginning Date	3 Months from Audit Period Ending Date

XIII. TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue permit for the discharge described in this Statement of Basis.

XIV. REFERENCES:

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

<u>Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards,"</u> Louisiana Department of Environmental Quality, 2004.

<u>Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program,"</u> Louisiana Department of Environmental Quality, 2004.

<u>Low-Flow Characteristics of Louisiana Streams</u>, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

<u>LPDES Permit Application to Discharge Wastewater</u>, Town of Columbia, Columbia Municiple Wastewater Treatment Plant, March 26, 2008.